



U.S. Department of Justice

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Via Electronic Filing

Hon. Douglas E. Arpert, U.S.M.J.
United States District Court
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: 30-Day Adjournment of Rule 16 Conference
B.Y.C.C., et al. v. United States, No. 22-cv-06586-MAS
J.A.L.C., et al. v. United States, No. 22-cv-06587-MAS
R.J.P., et al. v. United States, No. 22-cv-06588-MAS

Dear Judge Arpert:

This Office represents Defendant the United States of America in the above-referenced matters. We write with the consent of Plaintiffs' counsel to respectfully request a 30-day adjournment of the Rule 16 conference, including the date by which the parties must submit a proposed Joint Discovery Plan.

The parties have been meeting and conferring over the past few weeks regarding various issues related to the production of electronically stored information ("ESI"), including finalizing a proposed confidentiality order and ESI protocol. We have also discussed a general structure for discovery, including extensive rolling productions from the United States once the Court enters a confidentiality order. We are still negotiating several terms in the proposed confidentiality order with Plaintiffs, which requires the United States to closely coordinate with Department of Justice components and our client-agencies. However, we are optimistic we can work through these issues without Court intervention and believe that a 30-day adjournment of the initial Rule 16 conference and Joint Discovery Plan will make the conference more productive for the parties and the Court.

If this proposal is acceptable to the Court, we respectfully request that Your Honor “so order” this letter and have the clerk file it on the docket. Thank you very much for your consideration of these requests.

Respectfully submitted,

PHILIP R. SELLINGER
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By: /s/ Samantha R. D'Aversa
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cc: All counsel of record
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